

# EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,  
Plaintiffs,**

**v.**

**BRAD RAFFENSPERGER, ET AL.,  
Defendants.**

**Civil Action No. 1:17-CV-2989-AT**

**RESPONSE OF COALITION FOR GOOD GOVERNANCE TO  
BRAD RAFFENSPERGER'S FIRST REQUEST FOR  
PRODUCTION OF DOCUMENTS**

Plaintiff Coalition for Good Governance (“Coalition”) responds to Brad Raffensperger’s First Request for Production of Documents as follows (“the Requests”). The defined terms in this Response are the same as those in the Requests. Note: for the purpose of these responses, the term “responsive documents” means documents in Coalition’s possession or control and does not include privileged attorney client communication or work product.

**Request 1**

All of your financial books and records, including balance sheets, bank statements, ledgers, and expense reports, that reflect any diversion of financial resources as a result of your challenges to the Election System and/or the

All videos, recordings of any kind, photographs and any other tangible evidence responsive to any of the above requests for production of documents directed to the Coalition.

**Coalition Response**

Coalition objects to this request because the burden of producing such documents is far out of proportion to whatever relevance or materiality they have to the case. Relevant and material documents responsive to this request will be produced to the extent they are responsive to the other requests which seek documents supporting Coalition's claims. No documents will be produced specifically in response to this request.

**Request 21**

All documents received from nonparties through subpoenas issued in the Litigation.

**Coalition Response**

Responsive documents will be produced.

**Request 22**

Any and all documents reflecting any correspondence or communication with or from any member(s) of the press that mention or refer to the Litigation and/or your challenges to the Election System.

**Coalition Response**

Coalition objects to this request because it is burdensome far out of proportion to its utility in capturing relevant evidence that cannot be obtained with more reasonable, narrow, or focused requests. Responsive documents exist, but will not be produced.

**Request 23**

Any and all documents reflecting any correspondence or communication with or from any political campaigns that mention or refer to the Litigation and/or your challenges to the Election System.

**Coalition Response**

Coalition objects to this request because the phrase “political campaign” is not defined. Coalition also objects to this request because the burden of producing such documents is far out of proportion to whatever relevance or materiality they have to the case. Relevant and material documents responsive to this request will be produced to the extent they are responsive to the other requests which seek documents supporting Coalition’s claims. No documents will be produced specifically in response to this request. To the extent “political campaign” means only “political candidate,” *see* response to Request 24.

**Request 24**

Any and all documents reflecting any correspondence or communication with or from any political candidates that mention or refer to the Litigation and/or your challenges to the Election System.

**Coalition Response**

Coalition objects to this request because the burden of producing such documents is far out of proportion to whatever relevance or materiality they have to the case. Relevant and material documents responsive to this request will be produced to the extent they are responsive to the other requests which seek documents supporting Coalition's claims. No documents will be produced specifically in response to this request. Without waiving this objection as to other documents, and solely for the purpose of avoiding a discovery dispute, Coalition will produce a set of documents that include mass emails sent to elected officials who may also be candidates, and mass emails sent to internal lists of 2020 Georgia candidates.

**Request 25**

Any and all documents reflecting any correspondence or communication with or from any political parties that mention or refer to the Litigation and/or your challenges to the Election System.

**Coalition Response**

Coalition objects to this request because the burden of producing such documents is far out of proportion to whatever relevance or materiality they have to the case. Relevant and material documents responsive to this request will be produced to the extent they are responsive to the other requests which seek documents supporting Coalition's claims. No documents will be produced specifically in response to this request.

**Request 26**

Any and all documents reflecting any correspondence or communication with or from any member of the public that mention or refer to the Litigation and/or your challenges to the Election System.

**Coalition Response**

Coalition objects to this request because the burden of producing such documents is far out of proportion to whatever relevance or materiality they have to the case. Relevant and material documents responsive to this request will be produced to the extent they are responsive to the other requests which seek documents supporting Coalition's claims. No documents will be produced specifically in response to this request.

**Request 27**

Any and all documents reflecting any correspondence or communication with or from any voting rights or election integrity organization that mention or

refer to the Litigation and/or your challenges to the Election System.

**Coalition Response**

Coalition objects to this request because the terms “voting rights or election integrity” organizations is not defined. In addition, Coalition objects to this request because the burden of producing such documents is far out of proportion to whatever relevance or materiality they have to the case. Relevant and material documents responsive to this request will be produced to the extent they are responsive to the other requests which seek documents supporting Coalition’s claims. No documents will be produced specifically in response to this request.

**Request 28**

Any and all documents reflecting any correspondence or communication with or from any teachers, professors or other members of the academic community that mention or refer to the Litigation and/or your challenges to the Election System.

**Coalition Response**

Coalition objects to this request because it is burdensome far out of proportion to its utility in capturing relevant evidence that cannot be obtained with more reasonable, narrow, or focused requests. Responsive documents exist, but will not be produced.